

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

IN RE:

W. R. GRACE & CO., ET AL.

DEBTOR.

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CASE NO. 01-1139-JKF
(CHAPTER 11)

**FIRST AMENDED VERIFIED STATEMENT OF CHRIS PARKS & ASSOCIATES
UNDER BANKRUPTCY RULE 2019 AS OF OCTOBER 31, 2005**

CHRIS PARKS, being first duly sworn, hereby deposes and states as follows:

1. I, Chris Parks, am an attorney with the law firm of Chris Parks & Associates, 1 Plaza Square, 2nd Floor, Port Arthur, Texas 77642. I am a member in good standing of the bar of the state of Texas. The Firm is a professional corporation organized under the laws of the state of Texas, with offices for the practice of law located at 1 Plaza Square, 2nd Floor, Port Arthur, Texas 77642.
2. I have personal knowledge of the facts set forth herein. I make this Verified Statement and file it in accordance with Rule 2019 (a) of the Federal Rules of Bankruptcy Procedure and the Court's Order of October 22, 2004.
3. I certify under penalty of perjury that the law firm of Chris Parks & Associates has been retained as counsel or co-counsel for each of the Claimants listed on Exhibit "A." As of the date of this Verified Statement, the Firm represents hundreds of personal injury claimants who have been injured by asbestos products manufactured, marketed, distributed, sold or produced by Debtor and others, and thus hold claims against, *inter alia*, the Debtor.
4. A blank, unredacted, exemplar copy of the form of agreement whereby Chris Parks & Associates is empowered to act on behalf of the Claimants is attached hereto as Exhibit "B."

5. Pursuant to the Court's Order, this Statement is filed without the Exhibits, which are being provided in CD format to the Clerk of the Court, counsel for the Debtor and the United States Trustee.

6. With reference to the time of the employment of Chris Parks & Associates:

- (a) Chris Parks & Associates has a contingency fee interest in the claim;
- (b) Chris Parks & Associates acquired this interest on February 15, 2004;
- (c) This is a contingent contract and payment is dependent solely on recovery;
- (d) At this time, there has been no sale or disposition of this interest by Chris Parks & Associates.

7. The nature of the claim held by each Claimant is a personal injury tort claim for damages caused by asbestos products manufactured by the Debtor.

8. Since the Claimants were exposed to asbestos products manufactured by the Debtor more than one year prior to the filing of the above-captioned bankruptcy case, each of the Claimants may have "acquired" his or her claim more than one year prior to the filing of this bankruptcy case. The Claimants affirmatively assert that the statutes of limitations applicable to their claims did not begin to run on the date of exposure and reserve all procedural and substantive rights pertaining to their claims.

9. The Claimants are represented by the Firm under a fee agreement which is subject to the attorney-client privilege. The Firm holds each such instrument as executed between the parties.

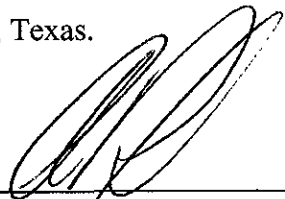
10. The Firm does not hold any claims against or interests in the Debtor, excepting what some could characterize as a beneficial interest (a contingent fee) in certain claims, settlements and/or judgments for asbestos personal injuries of some of the Firm's clients.

11. The filing of the Firm's Verified Statement does not waive any rights, including (i) the Claimants' rights to have final orders in non-core matters entered only after *de novo* review by a

district judge; (ii) the Claimants' rights to trial by jury in any proceeding and any trial on their claims; (iii) the Claimants' rights to have the reference withdrawn by the District court in any matter subject to mandatory or discretionary withdrawal or abstention to the extent not previously directed; (iv) the Claimants' rights in not submitting themselves to the jurisdiction of the Bankruptcy Court; or (v) any other rights, claims, actions, defenses, reclamations, setoffs, or recoupments to which the Claimants are or may be entitled under any agreements, in law or in equity, all of which rights, claims, actions, defenses, reclamations, setoffs, and recoupments the Firm's Claimants expressly reserve.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on October 31, 2005 at Port Arthur, Texas.


Chris Parks

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